

August 8, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth St., S.W.  
Washington, DC 20554

Re: Application of Cellco Partnership d/b/a Verizon Wireless and  
SpectrumCo, LLC for Consent to Assign Licenses;  
Application of Cellco Partnership d/b/a Verizon Wireless and Cox TMI  
Wireless, LLC for Consent to Assign Licenses, WT Docket No. 12-4

Dear Ms. Dortch:

Hawaiian Telcom Communications, Inc. ("HTCI") responds to the August 3, 2012 filing of Verizon Wireless, Cox, and SpectrumCo, on behalf of its members Comcast, Time Warner Cable, and Bright House Networks (collectively, "Applicants")<sup>1</sup>. The Applicants wrongly accuse HTCI of filing its first substantive comments in the docket on July 20, 2012 when in fact HTCI has filed several substantive documents as early as February 21, 2012.

HTCI initially filed a Petition to Deny or Condition Assignment of Licenses ("Petition") on February 21, 2012. HTCI then filed an Ex Parte notice on March 12, 2012 which highlighted the meeting that HTCI had with FCC Staff on March 8, 2012. Reply Comments were then filed on March 26, 2012. All of these were filed many months prior to HTCI's comments filed on July 20, 2012.

HTCI again urges the Commission to consider the impact of the agency, resale and joint operating agreements filed in this proceeding by the Applicants (the "Commercial Agreements"). HTCI is relying on the Commission's reviewing of the entire Commercial Agreements and reaching out to the industry, as portions have not even been available to outside counsel who signed protective orders.

Please contact Steven Golden at (808) 546-3877 or [steven.golden@hawaiiantel.com](mailto:steven.golden@hawaiiantel.com) should you have any questions.

Very truly yours,



John T. Komeiji  
Senior Vice President and General Counsel

cc: Sandra K. Danner, Broadband Division  
Wireless Telecommunications Bureau

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<sup>1</sup> Letter from Verizon Wireless, SpectrumCo and Cox Wireless, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 12-4 (August 3, 2012), Response to Comments at footnote 4.